



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105-3901

APR 01 2016

David V. Ubernaga  
Superintendent  
Grand Canyon National Park  
National Park Service  
P.O. Box 129  
Grand Canyon, AZ 86023

Subject: Draft Environmental Impact Statement for the Backcountry Management Plan, Grand Canyon National Park (CEQ# 20150343)

Dear Mr. Ubernaga:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The proposed Backcountry Management Plan is an update to the 1988 Plan and proposes use levels that manage backpacking, canyoneering, climbing, and other recreation in Grand Canyon National Park. Based on our review of the Draft EIS, we have rated the Preferred Alternative as *Lack of Objections (LO)* (See attached "Summary of EPA Rating Definitions").

The Draft EIS states that the undesirable impacts of humans in the backcountry, (e.g. chemical and bacterial contamination from lotions and sprays while bathing, human waste disposal) will be mitigated through education and promotion of Leave-No-Trace principles. EPA agrees that education about sustainable and low impact recreational practices should help to ensure that Grand Canyon's most sensitive resources are protected. To aid decision makers and the public in identifying the most effective approaches to such education, we suggest that the Park Service include in the Final EIS further description of the educational material to be used or developed, the target audience(s), and the dissemination methods that would be employed.

The EPA acknowledges NPS's discussion of projected climate change impacts on the Back Country Management Plan's affected environment, and its consideration of climate change in evaluating resource conditions to guide adaptive management actions. The adaptive management approach outlined in the Draft EIS provides strategies of science, mitigation, adaptation, and communication that should enable Grand Canyon National Park to address climate change throughout implementation of this backcountry management plan for the next twenty years.

EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is released for public review, please send one hard copy and one electronic copy to the address above (specify Mail Code ENF-4-2) at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please contact me at 415-972-3521, or contact Stephanie Gordon, the lead reviewer for this project, at 415-972-3098.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kathleen Martyn Goforth". The signature is fluid and cursive, with a long horizontal line extending from the end.

Kathleen Martyn Goforth, Manager  
Environmental Review Section

Enclosure: Summary of EPA Rating Definitions

Cc: Rachel Bennett, NPS Project Manager



## SUMMARY OF EPA RATING DEFINITIONS\*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

### ADEQUACY OF THE IMPACT STATEMENT

#### *"Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment